



**WESTERN WORLD
INSURANCE COMPANY**

400 PARSON'S POND DRIVE
FRANKLIN LAKES, NEW JERSEY 07417-2600
TELEPHONE: (201) 847-8600
FAX: (201) 847-1910

DIRECT TELEPHONE NO.: (201) 848-6411
TOLL FREE NO.: (866) 852-2990 x6411
DIRECT FAX NO.: (201) 847-7548
E-MAIL: l.riverso@westernworld.com

August 7, 2014

Todd Shields
Professional Collection Consultants
3rd Floor
6700 South Centinela Boulevard
Culver City, CA 90230

RE: Insured: Professional Collection
Consultants
Claimant: Gregory Hudson
Claim No.: 114165
Policy No.: BRL8000034
Policy Period: February 17, 2014 to
February 17, 2015
Limit of Liability: \$1 million per claim/aggregate
Retention: \$50,000 each claim

Dear Mr. Shields:

Western World Insurance Company acknowledges receipt of the notice of claim in the above matter on July 11, 2014. Western World has received with the notice of claim information a copy of the July 7, 2014 letter from the Law Offices of Mark Allen Kleiman advising of his representation of Gregory Hudson. It is noted that Attorney Kleiman demands mediation arising from allegations of retaliation and discrimination, and the wrongful termination of Gregory Hudson.

A claim file has been established under the above-referenced claim file number. Please refer to this claim file number whenever corresponding with Western World Insurance Company on this matter. Facsimiles may be sent directly to my attention at (201) 847-7548. I can also be reached through electronic mail at l.riverso@westernworld.com.

This claim file has been established under the Directors, Officers, Insured Entity and Employment Practices Liability Policy No. BRL8000034 issued to Professional Collection Consultants. This policy has the effective dates of February 17, 2014 to February 17, 2015 on a claims-made and claims-reported basis. The policy provides for a limit of liability of \$1 million per claim with a \$1 million aggregate limit. There is a \$50,000 per claim retention under the

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Employment Practices Liability Coverage Part. that applies to both indemnity payments as well as any expenses incurred on the insured's behalf.

Please be advised that Western World has retained the law office of Thompson, Coe & O'Meara, LLP to respond to the demand for mediation and protect the interests of Professional Collection Consultants in this matter. In particular, Attorney Francis O'Meara has been assigned to handle this matter, and we request that you provide Attorney O'Meara and her associates with your utmost cooperation in this regard.

By copy of this letter, we are advising defense counsel to send their legal bills directly to Professional Collection Consultants until the \$50,000 retention has been satisfied.

Legal expenses above the \$50,000 retention shall be billed to and paid directly by Western World Insurance Company.

Western World Insurance Company otherwise reserves all of its rights based on the limited information currently available.

If you have any questions regarding this letter or the coverage provided under the policy, please call me at (201) 848-6411.

Very truly yours,



Louis Riverso
Senior Litigation Specialist

LR/rv (ch)
114165 Professional Collection L1 14 LR rv.docx
Cert. 7013 1090 0000 7916 8987/RRR
cc: Agent #16104 – U.S. Risk Pro
DiBuduo & DeFendis Insurance Brokers, LLC
Frances O'Meara, Esq.
Thompson, Coe & O'Meara, LLP